

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,
v.
CHARLIE JAVICE and OLIVIER AMAR,
Defendants.

23-cr-00251-AKH

**DEFENDANT OLIVIER AMAR'S PROPOSED
PRELIMINARY JURY INSTRUCTION ON SEPARATE CONSIDERATION**

Pursuant to the Court's directive at the February 4, 2025 final pretrial conference, Defendant Olivier Amar, through his undersigned attorneys, respectfully submits the following proposed preliminary jury instruction regarding separate consideration of the defendants.

As you know, two defendants are on trial in this case. Even though the defendants are being tried together, you must, as a matter of law, consider each count of the indictment and each defendant's alleged involvement in that count separately. It is your duty to give separate individualized consideration to the case of each defendant, and without regard to the guilt or innocence of the other.

Dated: February 5, 2025

Respectfully submitted,

/s/ Jonathan D. Cogan
Jonathan D. Cogan
Sean S. Buckley
Alexandria E. Swette
KOBRE & KIM LLP
800 Third Ave.
New York, NY 10022
(212) 488-1200
Jonathan.Cogan@kobrekim.com
Sean.Buckley@kobrekim.com
Alexandria.Swette@kobrekim.com

Counsel for Defendant Olivier Amar